

CROWSON

VS

WASHINGTON COUNTY

BRETT LYMAN

April 16, 2018



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Brett Lyman

April 16, 2018

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

* * *

MARTIN CROWSON,

)

Plaintiff,

)

Case No. 2:15-cv-00880

vs.

)

Deposition of:

WASHINGTON COUNTY,

)

BRETT LYMAN

Defendants.

1

COPY

* * *

April 16, 2018

9:00 a.m.

WASHINGTON COUNTY TREASURER OFFICE
197 East Tabernacle Street
St. George, Utah

* * *

Linda Van Tassell
- Registered Diplomate Reporter -
Certified Realtime Reporter

April 16, 2018

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1		
2	A P P E A R A N C E S	
3	For the Plaintiff: Ryan J. Schriever	
4	SCHRIEVER LAW FIRM	
5	51 East 800 North	
6	Spanish Fork, Utah 84660	
7	For the Defendant Frank D. Mylar	
8	Washington County: MYLAR LAW, PC	
9	2494 Bengal Boulevard	
10	Salt Lake City, Utah 84121	
11	For the Defendant Gary T. Wight	
12	Larrowe: KIPP & CHRISTIAN	
13	10 Exchange Place, 4th Floor	
14	Salt Lake City, Utah 84111	
15	Also Present: Brian Graf	
16	* * *	
17	I N D E X	
18	EXAMINATION	PAGE
19	By Mr. Schriever	3
20	By Mr. Wight	79
21	By Mr. Schriever	80
22		
23		
24		
25		
	4	5
1	Q. The allegations here are that there were	
2	some things that happened regarding medical	
3	treatment that shouldn't have happened. Do you know	
4	the incident I'm referring to?	
5	A. After reading about it, yes.	
6	Q. I'm going to get to that. A deposition	
7	is testimony under oath. There's obviously no judge	
8	here today. This is called a discovery deposition.	
9	A. Right.	
10	Q. Which means I get to ask you questions	
11	about the incident, about your memory of the event.	
12	The only thing I expect is that you'll give us	
13	truthful complete answers.	
14	A. Right.	
15	Q. From time to time I may ask you a	
16	question that your counsel will object to. That is	
17	usually for the purpose to make sure the objections	
18	are preserved later on so when we're in court he can	
19	argue that he did object.	
20	A. Right.	
21	Q. Most of the time you'll answer. If he	
22	doesn't want you to answer, he'll instruct you not	
23	to answer.	
24	A. Right.	
25	Q. It's not a marathon. I don't expect	
1	that we're going to be here -- we've got about three	
2	hours set aside for this but I don't think it will	
3	take that long but if you do need a break for any	
4	reason, let me know and we can do that.	
5	A. Right.	
6	Q. Do you have any questions as to what a	
7	deposition is?	
8	A. No.	
9	Q. Have you taken any medications that	
10	would impair your ability to understand questions	
11	and answer appropriately?	
12	A. No.	
13	Q. Just to give you a road map of the	
14	organization that I'm going to try to follow today,	
15	although it may be loose because I may follow your	
16	train of thought from time to time as well, I just	
17	want to get some background information about who	
18	you are and kind of what your experience is.	
19	A. Okay.	
20	Q. Then I want to talk to you about the	
21	procedures and processes in place at Purgatory jail	
22	to the best of your knowledge and what you did there	
23	as a job.	
24	A. Okay.	
25	Q. And then I want to speak with you	

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	6	7
1 specifically about Mr. Crowson --		1 A. I've worked for McNabb Trucking in
2 A. Okay.		2 Pocatello, Idaho. I've worked with Harley-Davidson,
3 Q. -- and then about the events that you		3 Zion Harley-Davidson. I've worked for Saddleback
4 remember.		4 Lighting. That's pretty much it.
5 A. All right.		5 Q. Were all those jobs in between 2015 and
6 Q. What is your date of birth?		6 2018?
7 A. 12-10-66.		7 A. Yes.
8 Q. Are you currently employed?		8 Q. Prior to getting employment with the
9 A. Yes.		9 county in April of -- you said 1998?
10 Q. Where are you employed?		10 A. Uh-huh.
11 A. Intermountain Healthcare.		11 Q. Prior to that, what did you do for a
12 Q. What do you do for Intermountain		12 living?
13 Healthcare?		13 A. Construction.
14 A. I work as a security officer for the		14 Q. What kind of construction did you do?
15 hospital.		15 A. You name it, I've done it. Mostly
16 Q. At Dixie Regional?		16 concrete but framing, painting, sheetrock, finish
17 A. Yes.		17 carpentry.
18 Q. How long have you been doing that?		18 Q. What's your educational background?
19 A. Almost a year.		19 A. I have about three years of college,
20 Q. When were you employed with the county?		20 maybe a little bit more.
21 A. April of '98 until July of 2015.		21 Q. Where did you go to college?
22 Q. And since that time have you been		22 A. San Bernardino Valley College, Riverside
23 employed with Intermountain?		23 Community College and Palomar College, all down in
24 A. No.		24 California.
25 Q. Where else have you worked?		25 Q. Is that where you were raised, in
	8	9
1 Southern California?		1 A. Yes.
2 A. Yes.		2 Q. Did you do any POST training anywhere
3 Q. How long have you lived in Utah?		3 else?
4 A. Twenty-five, 26 years.		4 A. Not outside the county, no. There is a
5 Q. Do you have any degrees or certificates?		5 lot of training we did over the years when I was
6 A. No.		6 employed with the county.
7 Q. What did you do to become a correctional		7 Q. What kind of training is that? What are
8 officer?		8 you talking about?
9 A. The testing process, is that what you're		9 A. Firearms instructor training, extensive
10 looking for?		10 firearms basic training, carbine training, shotgun
11 Q. Yeah. What process did you go through		11 training. We go through an annual training. You
12 to become a correctional officer?		12 have to maintain 40 hours of training every year to
13 A. The county was in the process of		13 recertify your law enforcement certification and so
14 building Purgatory and they did an inhouse academy		14 there was a lot of first-aid, CPR, AED, a lot of
15 which at that time was called Special Function. It		15 like HIPAA and there were a lot of other laws
16 was the first part of becoming a law enforcement		16 pertaining to corrections that we trained every year
17 officer but you only had to have that first part in		17 as part of that.
18 order to work at the jail. And we came here Monday		18 Q. Okay. You mentioned several things
19 through Thursday nights for four hours and four		19 related to healthcare, even some that aren't viewed
20 hours on Saturday mornings and we did that for I		20 as healthcare like first-aid, CPR, things like that.
21 think three to four months. And in order to get		21 A. Right.
22 there, though, you had to do a physical fitness test		22 Q. Did you receive any training alongside,
23 and extensive background checks. That's about it.		23 for example, the nurses that worked at the prison?
24 Q. Did you complete all that prior to your		24 A. They would actually -- a lot of the
25 employment in 1998?		25 nurses would do the first-aid training themselves

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	10	11
1 but we received that training and a lot of them were 2 in the trainings as well.	1 side.	
3 Q. Okay.	2 Q. Help me understand that a little bit 3 better. Well, let me ask you first. At all times 4 when you worked for the county --	
4 A. When you say alongside --	5 A. I was in corrections, yes.	
5 Q. Well, I don't have any answer in mind 6 when I ask the question. I'm listening to you.	6 Q. And you're saying now it's changed?	
7 A. Okay.	7 A. No. The correction or the court	
8 Q. So did any of the training involve 9 things like recognizing medical conditions, anything 10 like that?	8 security in its little division, whatever you want	
11 A. Not specifically that I can recall. It	9 to say, you have the corrections part of the	
12 was just basic CPR and first-aid.	10 sheriff's office, you have the patrol side and when	
13 Q. Any training in inmate discipline?	11 I worked court security the courts fell under the	
14 A. No.	12 corrections side of the sheriff's office as far as	
15 Q. Did you ever work for the county at the 16 Purgatory jail?	13 day-to-day stuff. At some point after I left court	
17 A. Yes. I worked at the fifth district	14 security, they put it under the patrol side of the	
18 courthouse and justice court as court security	15 sheriff's office.	
19 three or four different times but a total of about	16 Q. Okay.	
20 five years of my time with the county.	17 A. I have no idea why. That's just what	
21 Q. Okay. Other than that, were you a 22 correctional officer at Purgatory?	18 happened.	
23 A. Yes. Now, at that time the court	19 Q. And that never affected you --	
24 security was under the corrections side of the	20 A. Right.	
25 sheriff's office. These days it's under the patrol	21 Q. -- because you were always in the 22 corrections side.	
	23 A. Right.	
	24 Q. When you left your job in 2015, what was 25 the reason you left your job?	
	12	13
1 A. Well, I --	1 C O N F I D E N T I A L	
2 MR. MYLAR: I'm just going to interject	2 Q. Go ahead. I was asking you about the 3 reasons you left your employment and are no longer 4 at Washington County.	
3 here. To the extent you talk about his employment	5 A. An inmate of African American heritage	
4 background that's not completely relevant to the	6 claimed that I called him a nigger and that prompted	
5 suit, I'm going to ask that it be considered	7 an investigation which on that part of it -- well,	
6 confidential and protected so that it would not be	8 throughout the whole investigation I had been	
7 able to be filed or be filed under seal and that	9 cleared but there were other things that other staff	
8 type of thing.	10 brought up as far as making complaints against me,	
9 MR. SCHRIEVER: I'll stipulate, too.	11 not just the inmates but there were other inmates	
10 MR. MYLAR: Okay, great. So if you	12 that backed my side of the story because that is not	
11 could just make a marking now in the deposition this	13 the type of person that I am. I never did my job	
12 is confidential.	14 that way. I don't think that way.	
13 MR. SCHRIEVER: Okay.	15 So after the investigation was over then	
14 MR. MYLAR: Thanks.	16 they decided to put me on administrative leave and I	
15	17 took it as a sign for me to resign. Usually during	
16	18 an investigation they put you on administrative	
17	19 leave pending the outcome but there were -- it	
18	20 wasn't the normal way of doing things and you either	
19	21 take the chance on not getting fired and keeping	
20	22 what years of service you have towards a retirement	
21	23 or, if you get fired, you lose all that.	
22	24 And so at that time, even though I knew	
23	25 that I had been cleared in the investigation that	
24	C O N F I D E N T I A L	
25		

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	14		15
1	the county decided to put me on administrative leave	1	that we're in.
2	that it didn't bode well for me.	2	MR. MYLAR: You're not going to have any
3	Q. You said there were staff complaints.	3	other questions on that area, is that what you're
4	What kind of complaints did the staff make?	4	saying?
5	A. The only one that I was bringing outside	5	MR. SCHRIEVER: There are still some
6	food in for the inmates, which I didn't bring	6	issues of grievances but nothing about losing his
7	outside food in for myself. I know that there was a	7	employment.
8	couple of people on our shift that on Saturdays or	8	MR. MYLAR: Well, to the extent the
9	Sundays they would go get pizzas or donuts. I have	9	grievances don't have anything to do with this
10	no idea how that turned to me but I know that there	10	instance --
11	were at least from how I saw things there were young	11	MR. SCHRIEVER: Or at least this inmate.
12	younger staff that did not like working for me	12	MR. MYLAR: Yeah.
13	because the new generation coming in didn't have a	13	MR. SCHRIEVER: Right.
14	work ethic and they didn't like me. You come, you	14	THE WITNESS: Well, when you say
15	to work, you get to work. You better be ready to	15	grievances, to me -- I know what you're probably
16	work, have your shirt tucked in, your boots tied up	16	going to get at.
17	and be ready to go. Anyway, I was being really	17	MR. MYLAR: Well, let him ask the
18	difficult to be around and I sometimes wonder if	18	questions.
19	that was what -- I was driving myself away.	19	THE WITNESS: Okay.
20	Q. Okay. I want to ask you about the --	20	MR. SCHRIEVER: The whole thing can be
21	well, any other grievances or complaints that you	21	filed under sealed for all I care. That doesn't
22	remember that were significant in regard to that?	22	really bother me.
23	A. No.	23	MR. MYLAR: Okay.
24	MR. SCHRIEVER: And I don't have any	24	MR. SCHRIEVER: I'm not here to try to
25	other questions if we want to remove the designation	25	get any kind of media attention to this.
	CONFIDENTIAL		CONFIDENTIAL
	16		17
1	MR. MYLAR: Okay.	1	A. They didn't -- yeah.
2	MR. SCHRIEVER: We already turned down a	2	Q. So when we're talking about inmate
3	news interview from ABC, to be honest with you.	3	grievances, we're talking about things that start
4	That's not what I'm after.	4	with the inmate making a complaint.
5	MR. MYLAR: Okay.	5	A. Right.
6	Q. I guess the question that he raised is	6	Q. And where do they file that or how do
7	complaints with the employment versus grievances.	7	they initiate that?
8	Do you see those as two separate things?	8	A. Well, in the first part of my career
9	A. Well, there are inmate grievances as far	9	they started by writing it on a piece of paper and
10	as inside the correctional setting that dealt with	10	then they have -- they brought these TellMate kiosks
11	day-to-day things, not a grievance that is going to	11	into the sections and then the inmates I believe did
12	get somebody terminated.	12	it on one of those.
13	Q. And we're still under seal here. This	13	Q. And I don't know if I just didn't hear
14	particular one that you mentioned, the incident	14	you correctly or if I don't know the words that you
15	where the inmate accused you of calling him a	15	used. You said tail --
16	nigger --	16	A. TellMate.
17	A. Right.	17	Q. TellMate, what is that?
18	Q. -- that began as an inmate grievance.	18	A. It is a video -- well, it's a phone and
19	A. Yes.	19	a video visiting unit that the county bought into
20	Q. And then during the investigation it	20	and basically everything is done electronically
21	escalated into something more than that because	21	rather than writing things on pieces of paper. Like
22	there were other staff members and other things who	22	an inmate requests, "Hey, I only have one pair of
23	piled on, I guess.	23	socks. I need two pairs of socks." Rather than
24	A. Right. Yeah.	24	write that on a piece of paper, now it's done
25	Q. And had their own complaints.	25	electronically.
	CONFIDENTIAL		CONFIDENTIAL

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	18		19
1	Q. And they use a kiosk?	1	A. They could, yes.
2	A. Yes.	2	Q. Could they use it to report that they
3	Q. So it's a physical station in the	3	didn't like their lunch?
4	section?	4	A. Yeah.
5	A. Yeah.	5	Q. What are the types of things they can
6	Q. Where the inmate can go to. Do they	6	use that for, or did they use that for?
7	pick up a phone and --	7	A. If they had money, they could play games
8	A. Uh-huh.	8	on it. They can set up video visiting with their
9	Q. -- dictate or transcribe whatever they	9	family.
10	say?	10	Q. How many of these were there in each
11	A. No. They have to type it.	11	section?
12	Q. Oh, they type it.	12	A. I want to say at least two but they were
13	A. Yeah.	13	relatively new. I don't know -- it wasn't there
14	Q. They type it. Then where does it go	14	that long before I left so I never really got to
15	from there?	15	know much about them.
16	A. I don't know. As far as I know, each --	16	Q. Okay. Prior to this installation of
17	I don't really know or I don't recall.	17	TellMate kiosks, was the process for the inmate to
18	Q. Okay. They use TellMate to initiate a	18	initiate a grievance that the inmate would write out
19	grievance then?	19	on a piece of paper what the grievance was?
20	A. Yes.	20	A. Yes.
21	Q. Can they use it to report that they have	21	Q. And then they would give it to someone.
22	had confrontation with another inmate?	22	Who would they give it to?
23	A. They could, yes.	23	A. They had to give it to an officer.
24	Q. Could they talk about how they had a	24	Q. And then what would the officer do with
25	confrontation with a correctional officer?	25	it?
	CONFIDENTIAL		CONFIDENTIAL
	20		21
1	A. We would go into the computer system and	1	time they went to medical, every time you had a
2	log that into their -- each inmate is assigned a	2	conversation with an inmate, depending on what it
3	number. You go into their number so you're into	3	was. You know, you go into the dormitory section
4	their whole system and you have to put that you	4	and you shake down an inmate's bunk, you go back in
5	accepted that grievance, which means that you accept	5	and if there was anything that you found you just
6	responsibility to turn that in to the proper place	6	put it down that that happened to that inmate, his
7	in a proper manner.	7	bunk, whether there was no findings or any rule
8	Q. So it just goes into like a file for the	8	violations or not, just so there was a record that
9	inmate under that inmate's number, is that what it	9	it was done.
10	is?	10	Q. Were there any other computer files kept
11	A. Well, the paper doesn't. You just go	11	by correctional officers other than Spillman?
12	into the computer system and so that there's kind of	12	A. As far as --
13	a timestamp on when it was accepted by the officer	13	Q. Anything.
14	and then the officer puts it or directs it where it	14	A. Not that I know of. I didn't keep any.
15	needs to go.	15	Q. Did you have to enter information into
16	Q. Let me ask you, as long as we're talking	16	any program other than Spillman?
17	about this computer system, what types of things --	17	A. No, I did not.
18	did the computer system have a name?	18	Q. Were there other people at the prison
19	A. As far as -- oh, Spillman.	19	who did?
20	Q. Is it Spillman?	20	A. I don't know.
21	A. Yes.	21	Q. What about medical people, did they
22	Q. Okay. So you put all these grievances	22	enter their notes into Spillman?
23	into Spillman. What else goes into Spillman?	23	A. I think they did some in Spillman.
24	A. Every time they left for court, every	24	MR. MYLAR: Objection. Lack of
25	time they went out to the recreation yard, every	25	foundation.
	CONFIDENTIAL		CONFIDENTIAL

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	22	23
1 Q. Just to the extent that you know.	1 A. It's been so long since even long before	
2 A. Not that I know of. I was not privy to	2 I left out there I had nothing to do with booking.	
3 that.	3 Q. Okay.	
4 Q. Did you ever have access to any of the	4 A. I could tell you the law enforcement	
5 inmates' medical records or medical histories?	5 agency arrests somebody, they bring them in, they	
6 A. No.	6 book them on the computer system. I know a nurse	
7 Q. Were there ever instances where an	7 talks to them. At some point in time the booking	
8 inmate had a medical instance you were made aware of	8 staff completes their intake of a person and then,	
9 so you could watch for symptoms?	9 depending on who knows what, will depend on where	
10 A. Well, not that we were made aware of but	10 they get housed.	
11 there were several inmates that were frequent enough		
12 in there that we knew, like diabetics, couple of		
13 guys had food allergies, that type of stuff.		
14 Q. To your knowledge, walk me through the	11 I worked booking -- I take that back. I	
15 process of an inmate coming into the jail. To your	12 did work booking probably about two years in but it	
16 knowledge, what's the booking process?	13 was only for about six months and by the time I left	
17 MR. MYLAR: Wait. I think we could	14 the process was nothing like it was when I was there	
18 probably just remove the confidential at this point.	15 and I never put in to work booking. I never asked	
19	16 to. Just seemed like it was a big headache to me.	
20 END CONFIDENTIAL	17 Q. Okay. As a correctional officer, did	
21	18 you ever have access to any of the information that	
22	19 was obtained during the booking process?	
23	20 A. Yeah. You could go into Spillman and	
24	21 look but it was not something that was encouraged.	
25	22 Usually it seemed like the new officers always	
	23 wanted to see why somebody was arrested and I	
	24 discouraged that from happening because as a	
	25 corrections officer it didn't matter who or why	
	24	25
1 somebody was in there unless they posed a threat to	1 A. No.	
2 safety. You didn't want that clouding your judgment	2 Q. What's your basis for your belief that	
3 on how you dealt with people.	3 that happened?	
4 Q. Okay. So the booking information was in	4 A. Hearing people talk about it. I would	
5 Spillman as well?	5 come up to booking from time to time. You would see	
6 A. Yes.	6 people come in, especially if there was a combative	
7 Q. And that would contain the crime that	7 person coming in and officers would go to booking	
8 they were convicted of?	8 and there would always be a nurse there and so I	
9 A. Not convicted. Why they were arrested.	9 guess in a way I did see it but it wasn't part of my	
10 Q. So this is --	10 job. It wasn't part of my job description, so to	
11 A. Just the charges.	11 speak. It's not where I was assigned.	
12 Q. You had people in there who had been	12 Q. Okay. How many blocks were there at the	
13 convicted as well, didn't you, or were these just	13 prison?	
14 people who had only been arrested but not yet	14 A. A, B, C, D, E, F, G, H, I, J and K, so	
15 convicted?	15 11.	
16 A. No. We had people that were sentenced,	16 Q. Were they divided up by sections or how	
17 yes, that had convictions. But prior convictions,	17 was it organized?	
18 unless they were there doing their time for that	18 A. By sections, yes.	
19 specific conviction, their past convictions -- I	19 Q. What were the sections?	
20 guess I don't know if that was in there or not.	20 A. A, B and C were cells. There were seven	
21 Q. And you indicated that your belief was	21 on top, seven on bottom. D block was 48 inmates.	
22 that a nurse would go out and see the inmates who	22 E block was 50. F block was 60. F block was	
23 had been booked as well.	23 divided into two tiers, top and bottom, 30 on each.	
24 A. I believe so, yes.	24 F block was intake and at that time that was the max	
25 Q. Did you personally observe that?	25 control side. Now they're called east and west and	
	22	23
1 Q. Just to the extent that you know.	1 A. It's been so long since even long before	
2 A. Not that I know of. I was not privy to	2 I left out there I had nothing to do with booking.	
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15 convicted?	15 11.	
16 A. No. We had people that were sentenced,	16 Q. Were they divided up by sections or how	
17 yes, that had convictions. But prior convictions,	17 was it organized?	
18 unless they were there doing their time for that	18 A. By sections, yes.	
19 specific conviction, their past convictions -- I	19 Q. What were the sections?	
20 guess I don't know if that was in there or not.	20 A. A, B and C were cells. There were seven	
21 Q. And you indicated that your belief was	21 on top, seven on bottom. D block was 48 inmates.	
22 that a nurse would go out and see the inmates who	22 E block was 50. F block was 60. F block was	
23 had been booked as well.	23 divided into two tiers, top and bottom, 30 on each.	
24 A. I believe so, yes.	24 F block was intake and at that time that was the max	
25 Q. Did you personally observe that?	25 control side. Now they're called east and west and	

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	26		27
1	I couldn't tell you what's what. They did that	1	hours was done they would go back in and the other
2	after I left.	2	tier would come out. So they would have a total of
3	Q. And I really just want to know what it	3	eight hours out a day.
4	was at the time you were there.	4	Q. So the top part had glass doors that
5	A. G and H were female sections and I, J	5	would be sealed inside of the dormitory?
6	and K were dormitory -- and D, E and F were	6	A. Yes.
7	dormitory.	7	Q. Could they still wander around inside of
8	Q. And by dormitory you mean --	8	that area?
9	A. Bunks, two-man bunks and it was all out	9	A. Yes.
10	in the open.	10	Q. Were they assigned a specific bunk?
11	Q. And F was maximum security?	11	A. Yes.
12	A. Yes. It was the intake. So that was	12	Q. Okay.
13	the first place that people would come was in there	13	A. And there were speaker boxes inside so
14	and they would wait for a bed in general population.	14	they could press a button and talk to officers in
15	Q. Okay. Depending on where they needed to	15	the control room.
16	be in general population.	16	Q. All right. And that's 30 inmates on
17	A. Right.	17	each level.
18	Q. So F block was that single bunk cell?	18	A. Thirty beds on each level, yes.
19	A. No, it was not a cell. It was	19	Q. So if it was full, it was 30. If it was
20	dormitory. It was divided 30 on the bottom and 30	20	less than that, it was less than that.
21	on the top and they were behind glass and closed	21	A. Right.
22	doors, locked doors, so every four hours that would	22	Q. And then that was F block. The other
23	switch. The top guys would come out and have access	23	one that I was interested in is the A, B --
24	to the day room and the TV and the TellMates and go	24	A. And C were cells.
25	outside to the rec yard and then after their four	25	Q. Okay.
	28		29
1	A. There were seven two-man cells on top	1	A. From what I experienced it depended on
2	and seven on the bottom.	2	the person and I'm not a mental health expert. I
3	Q. Okay. What was their schedule?	3	did a lot of communicating with mental health
4	A. It depended on A block, usually they	4	inmates. I don't know why I could get through to
5	were out an hour a day for each cell and in B block	5	them but I somehow did. They either seemed to be
6	they were on the same rotation as F block where the	6	kept in booking or in C block, depending on the
7	top and the bottom would rotate every four hours.	7	level of whatever, I don't know. I don't know the
8	And then C block was medical and mental health and	8	specific answer for that.
9	depending on the inmates that were in that section	9	Q. Who made the assignments into the
10	at the time it would either be split up into fourths	10	blocks?
11	and every four hours they would rotate or it would	11	A. I want to say the supervisor in booking
12	be split top and bottom.	12	if there were no medical or mental health issues.
13	Q. Okay. Why was C block medical?	13	MR. MYLAR: I'm going to object again.
14	A. Just it used to be B block and C block	14	Lack of foundation.
15	was switched and then they switched them and why I	15	Q. Let's say you observed an inmate who was
16	don't know. It was for people that had crutches and	16	struggling in a certain block. Was there a process
17	walkers because they didn't want those going into	17	or a procedure for you to recommend that they be
18	general population because there's a lot more chance	18	transferred to a different location?
19	of one of those -- an implement like that being used	19	A. It depended on the situation.
20	to hurt somebody. And so if you had somebody that	20	MR. MYLAR: Objection. Lack of
21	was in a wheelchair or had to have a walker or	21	foundation again. Go ahead.
22	crutches or somebody that had a cast on their arm	22	A. A lot of times inmates weren't open to
23	seemed to be put there.	23	us and telling us what their problems were. If it
24	Q. Okay. What about people with mental	24	was something that we saw or if we were familiar
25	disorders and psychiatric issues?	25	with that inmate, we could look into it and we could

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1	go to our supervisor, explain what we saw. If we	1	of the jail because it was lockdown. It wasn't -- I
2	had an idea of where to move them, we could suggest	2	don't know -- anyway.
3	that.	3	Q. So let me try to get to what I
4	There were times when if you had inmates	4	understand the difference between maximum security
5	that got in a fight, well of course they had to be	5	as used to describe F block and lockdown as used to
6	moved. If there was a medical emergency -- well, we	6	describe A block.
7	wouldn't have anything to do with moving somebody	7	A. Right.
8	like that. That would be the medical department.	8	Q. What's the difference?
9	Q. Let me ask you a couple of followups	9	MR. MYLAR: And again objection. Lack
10	then. So let's just use the example of inmates who	10	of foundation. Go ahead.
11	got into a fight.	11	A. F block was intake. The inmates that
12	A. Uh-huh.	12	were able to go to general population but usually
13	Q. What's the process then to have them	13	there was no room to put them right into general
14	moved or separated? What do you have to do?	14	population, they waited in F block. A block, which
15	A. Depending on the extent of the injuries,	15	is lockdown, was punitive or they were waiting to
16	but you would always have them checked out by	16	have a hearing pending -- they were there pending a
17	medical. Usually if there were two combatants you	17	hearing.
18	would have them checked out by medical and they	18	Q. All right. So using my knowledge of old
19	would both go to A block for lockdown, pending a	19	movies, there's a term called solitary confinement.
20	hearing.	20	A. Yes.
21	Q. Okay. So A block was lockdown?	21	Q. You can tour Alcatraz and see where the
22	A. Yes.	22	Birdman lived. Was A block like that, like solitary
23	Q. And did I misunderstand you earlier to	23	confinement?
24	say F block was maximum security?	24	MR. MYLAR: Objection. Lack of
25	A. Yes. That was what they called that end	25	foundation.
	32		33
1	A. Impressions today, at least in our	1	A. Yes.
2	facility, there was no such thing as solitary	2	Q. They might be alone at times. They
3	confinement as a specific term. There were inmates	3	might have a bunkmate at other times.
4	that refused to get along with other inmates and you	4	A. Right.
5	could call that solitary confinement but it was not	5	Q. Well, actually before we leave A, you
6	something that was used as a specific term.	6	told us what the schedule was but I want to make
7	Q. The term wasn't used.	7	sure I'm clear. Were they allowed out of their
8	A. No.	8	lockdown cells?
9	Q. Did A block have -- was it open between	9	A. Yes.
10	the cells? Was there bars between the cells like	10	Q. How often?
11	you see in the old western movies?	11	A. Well, you had different levels. There
12	A. No, no bars. There were doors. Each	12	was a level system for the inmates. In A block you
13	door had a window in it.	13	have level 1A, which is, I guess for lack of better
14	Q. How big was the window?	14	term, worst of the worst, depending on the charges
15	MR. MYLAR: Objection. Lack of	15	he was arrested on, behavior while he was in there,
16	foundation.	16	and he did not -- those did not come out of their
17	Q. Well, if you know.	17	cell without restraints on.
18	A. I want to say maybe 5 inches by 16	18	And then there was a level 1 and then
19	inches.	19	there were lockdown. Level 1s could come out seems
20	Q. And they would be in that room by	20	to me more than an hour a day if there was time but
21	themselves.	21	the lockdowns came out I think an hour every day --
22	A. Yes. Well, not specifically. They were	22	every other day.
23	two-man cells, so there was two bunks in there.	23	Q. Okay. At least every other day?
24	Q. So just depending on how many inmates	24	A. Yeah.
25	were in that particular block then.	25	Q. And I'll ask you some specific questions

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1	about Mr. Crowson here in a minute.	1	Q. And then you receive the trays back the
2	A. Okay.	2	same way?
3	Q. How often were the people in A block	3	A. In A block they had Styrofoam trays and
4	observed by a correctional officer?	4	so when they came out they were required to clean
5	A. Well, we were required to walk through	5	their cells. Sometime before the end of the day
6	the sections at least once every hour and then if we	6	corrections staff would go in and collect all their
7	had to go in there to conduct business, more than	7	garbage through their cuff port. We have a big
8	once an hour. They are constantly being watched	8	garbage bag and they'd throw their garbage out.
9	from the control room. A block especially a lot of	9	Q. They were Styrofoam trays?
10	times would be listened to because they're yelling,	10	A. Yeah. The white Styrofoam trays that
11	communicating to each other.	11	had a lid that folded over.
12	Q. Okay. Did they go out for meals or were	12	Q. Okay. So everything was disposable?
13	meals brought to them?	13	A. Yeah.
14	A. Meals were brought to them in their	14	Q. Was that to avoid having a situation
15	cells.	15	where they would have something they could use to
16	Q. Was that done by correctional officers	16	create a weapon?
17	or was there separate staff that did that?	17	A. Yes.
18	A. No. Correctional officers would take	18	Q. Were they fed different food than the
19	them in.	19	general population?
20	Q. Was it the type of situation where it	20	A. No. Same food.
21	was slid through the windows?	21	Q. What was a typical menu?
22	A. There is a cuff port on the doors that	22	A. Depends on the supervisor of the
23	is probably 4 inches by maybe 12 inches. There's a	23	kitchen. We had one guy out there that was buying a
24	lock on it. You open that up and you slide the	24	lot of pre-prepared food. They had another guy that
25	trays through that.	25	they would cook everything. There was a lot of
	36		37
1	variety. I know at times there was probably a set	1	A. Yes.
2	menu.	2	Q. Sink with running water?
3	Q. Were they given fruit?	3	A. Yeah. It's all one unit.
4	A. Yes.	4	Q. Anything else in there besides a bunk,
5	Q. How often?	5	toilet and sink?
6	A. At least once a day with breakfast,	6	A. There is a metal desktop that's embedded
7	lunch or dinner. There was always fruit on one of	7	in the block wall and then there's a metal stool
8	the trays.	8	that's into the concrete floor. There's two of
9	Q. How were medications administered in A	9	those.
10	block?	10	Q. Any drawers?
11	A. The nurses would come down and they	11	A. No.
12	would be escorted in by an officer and then they	12	Q. Closets?
13	would go -- depending which inmates had medications	13	A. No.
14	we would go from door to door to door and they would	14	Q. Were they allowed to take any personal
15	be given their medications through the cuff door.	15	belongs into A block?
16	Q. Okay. If an inmate was in A block,	16	A. At first, no, when they're locked down.
17	would they have access to anyone other than a	17	But after they were -- well, I don't recall what the
18	correctional officer or a nurse?	18	matrix was. I know that as a level 1, when you're
19	A. What do you mean access?	19	not on lockdown status you're allowed minimal
20	Q. Was there any possibility for a person	20	personal items, letters, pictures, not very much.
21	who is either not a nurse or correctional officer to	21	But I don't recall the exact matrix for that.
22	come in contact with them?	22	Q. And if you're on lockdown status, you're
23	A. No.	23	not allowed any personal items at all then.
24	Q. Did the cells in A block have a toilet	24	A. I don't believe so.
25	with running water?	25	Q. Let's move back to F block for a minute.

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1	A. Okay.	1	A. Generally when they were intoxicated,
2	Q. This is where people who came in for	2	under the influence of something.
3	intake, so the first place they were sent?	3	Q. Who would make the decision to put
4	A. Yes.	4	someone in detox?
5	Q. Did you mention there were detox cells	5	MR. MYLAR: Objection. Lack of
6	in F block as well?	6	foundation.
7	A. No.	7	A. Specifically I couldn't tell you.
8	Q. Where were detox cells?	8	Q. Could it be anyone on the floor?
9	A. In booking.	9	A. When somebody is under the influence of
10	Q. They were in booking.	10	something it would -- well, I could guess but I
11	A. Yes.	11	don't know if you want me to guess.
12	Q. Okay. And I thought F block and booking	12	Q. Well, I don't want you to guess.
13	were the same thing.	13	A. I worked out there long enough to know
14	A. No. F block -- in max control the	14	that medical would be involved.
15	sections were kind of pie-shaped with the control	15	Q. Okay.
16	room in the center so that's A, B, C, D, E and F.	16	A. Somehow, some way, as well as whoever is
17	Q. Okay. And then booking is separate from	17	supervising booking.
18	that.	18	Q. So as a correctional officer, if thought
19	A. Yes.	19	somebody was under the influence of something, would
20	Q. Were there specific cells that were	20	you report that to medical?
21	designated as detox cells?	21	A. Yes.
22	A. There was one that actually had that on	22	Q. And then you would allow medical to take
23	it, yes, in booking.	23	care of it or were there steps that you were also
24	Q. And when did inmates go to the detox	24	required to take as a correctional officer?
25	cell?	25	A. It depended on the day. Sometimes the
	40		41
1	nurses would come down to us and sometimes they	1	Q. Did you receive any training on how to
2	would have us bring the inmate to them.	2	recognize symptoms of alcohol withdrawal?
3	Q. How many correctional officers were on	3	A. I don't recall that.
4	duty at any given time?	4	Q. Do you know what the symptoms of alcohol
5	A. Eight, nine, ten, 13, 14, 15, 16, 17 --	5	withdrawal are?
6	I'm going to say somewhere between 15 and 19.	6	MR. MYLAR: Objection. Lacks
7	Q. Do you know how many nurses were on duty	7	foundation. Go ahead.
8	at any given time?	8	Q. This is a foundational question. You
9	A. No. One, as far as I know. I know that	9	can answer yes or no as to whether you know.
10	during the day there were more. I have no knowledge	10	A. No, not specifically.
11	of their schedule or access to it or anything.	11	Q. Do you know what the symptoms of drug
12	Q. Okay. For inmates who were in detox,	12	withdrawals are?
13	were they still under the observation of the	13	A. Not specifically, no.
14	correctional officers?	14	Q. And setting aside -- I'm not claiming
15	A. I believe so. They were not put in a	15	you're an expert in these things but do you
16	medical cell so, yes, I believe they were under the	16	generally have an idea what they are?
17	observation of a correctional officer.	17	A. No. Not -- a least for me, not
18	Q. Did you receive any training on how to	18	specifically.
19	recognize whether someone was under the influence of	19	Q. In your time at the prison, at the jail,
20	alcohol?	20	I guess -- do you call it a jail or prison?
21	A. No.	21	A. Jail.
22	Q. Did you receive any training as to how	22	Q. Jail?
23	to recognize whether someone was under the influence	23	A. Yeah.
24	of medications or drugs?	24	Q. During your time at the jail did you
25	A. I don't believe so.	25	ever recommend that an inmate be placed into the

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1 detox cell?		1 out the sanctions. Or, depending if one or more	
2 A. I don't recall whether I have or		2 inmates had to be removed from that environment, you	
3 haven't. Right off the top of my mind it's not		3 could put them into lockdown pending the hearing and	
4 something I would recommend because it's not my area		4 then the hearing officer could have the hearing to	
5 to work so I would have -- I wouldn't have anything		5 recommend longer lockdown time, give them credit for	
6 to do with where somebody went up in booking or why.		6 the time they were placed in that cell or give them	
7 Usually that would be the booking staff, supervisor		7 time served and put them back somewhere in general	
8 or medical.		8 population. There were several different outcomes	
9 Q. As far as inmate discipline goes, if you		9 that could happen.	
10 observed something that you felt warranted		10 Q. So the correctional officer, if they	
11 discipline, is there a process that you would		11 feel like there's immediate -- let me back up. I	
12 initiate to have that done?		12 want to ask the question a little bit differently.	
13 A. Yeah. We would write a report and we		13 Under certain situations the correctional officer	
14 would do an inmate write-up.		14 can put them into lockdown pending the disciplinary	
15 Q. Where was that entered?		15 hearing.	
16 A. In the computer.		16 A. Right.	
17 Q. In Spillman?		17 Q. What are the criteria for determining	
18 A. In Spillman.		18 when the correctional officer had the discretion to	
19 Q. And then what was the disciplinary		19 make that decision?	
20 process?		20 A. Safety. Usually it's not -- initially	
21 A. You would do the write-up and you could		21 when we do that it's not punishment, it's	
22 either -- depending on the circumstances, you could		22 management. Because so many times people refuse to	
23 either leave them where they were and do the		23 manage themselves as far as following the rules,	
24 write-up and they would have a hearing with the		24 getting along with others, we have to step in and	
25 inmate disciplinary officer and then they would mete		25 make some changes.	
	44		45
1 Q. Did you have access to the nurses who		1 guys -- they have these game tables in the dormitory	
2 worked there at the jail?		2 sections. They're round and they have a base	
3 A. Yes.		3 that's, I don't know, it looks like -- you have a	
4 Q. Did you have the ability to alert them		4 five-gallon bucket but this looks like it's about an	
5 to any situations that you thought required medical		5 eight-gallon bucket screwed to the bottom of the	
6 attention?		6 table. Somehow they emptied all the sand and stuff	
7 A. Yes.		7 out of that base and put a garbage bag in there and	
8 Q. Did you have any issues with inmates		8 made some of it. From what I remember, it was	
9 getting access to alcohol while they were		9 pretty potent stuff.	
10 incarcerated?		10 A lot of times the guys in the cells	
11 A. Homemade alcohol, yes. Outside alcohol,		11 will put them in their shampoo or lotion bottles and	
12 no.		12 will leave them in the window to try to warm up to	
13 Q. Tell me about the homemade alcohol.		13 try to start cooking it. I've seen them -- they	
14 A. Fruit, sugar, bread, sometimes rice.		14 have peanut butter jars. They'll just leave them in	
15 They would just -- to me it was just an abomination.		15 their drawers or leave them laying around somewhere	
16 It was horrible. More times than not the inmates		16 and just let them ferment.	
17 appeared to be sick, start vomiting and -- I don't		17 One guy wrapped his up in plastic bags	
18 know exactly how it was made other than just -- I		18 and made this tube come off for it to vent off.	
19 don't know how to explain it.		19 Q. He was a real moonshiner then. He	
20 Q. Well, let's start with you identified		20 actually knew what he was doing.	
21 some of the ingredients.		21 A. Well, it was pretty evident when you	
22 A. Right.		22 walked by his area of the bunk, the smell we were	
23 Q. Where would they put it for it to		23 smelling.	
24 ferment?		24 Q. Yeah.	
25 A. Well, years ago we had a group of		25 A. But I've seen that stuff where the	

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1 peanut butter jar lid was cracked open and it starts		1 match head. It would be black and be wrapped up in	
2 pushing up out through the top of the jar. It's		2 tinfoil or paper or something.	
3 fermenting. And that's been my experience with it.		3 MR. MYLAR: Could we take a break?	
4 Q. Okay. How often would you guys discover		4 MR. SCHRIEVER: Sure. Yeah, we can take	
5 something like that?		5 a five- or ten-minute break.	
6 A. From what I saw or knew about, which I'm		6 (Recess.)	
7 not there all the time, maybe two or three times a		7 Q. Mr. Lyman, I want to ask you, do you	
8 month.		8 remember Martin Crowson?	
9 Q. Okay. How about illegal drugs in the		9 A. Yes.	
10 jail, is that something you guys found?		10 Q. Why is it that you remember Martin?	
11 A. Yes. Illegal drugs were found in the		11 A. I had a lot of interaction with him over	
12 jail probably weekly.		12 the years.	
13 Q. How did they get into the jail, do you		13 Q. When you say interaction, what do you	
14 know?		14 mean?	
15 A. Specifically, no. I can speculate but I		15 A. Just dealing with him. He seemed to	
16 don't know if that's what you want.		16 always bring a lot of attention on himself, talking,	
17 Q. I don't.		17 being boisterous.	
18 A. Okay.		18 Q. Do you know what he looks like?	
19 Q. I mean there's part of me that does,		19 A. Yeah.	
20 I'll be honest. The illegal drugs, you say weekly.		20 Q. How would you describe him?	
21 What types of drugs would you guys discover in the		21 A. Like height, weight? Medium build,	
22 prison?		22 sometimes he could be a little husky, short hair,	
23 A. The last few years I was there a lot of		23 usually had some facial hair.	
24 heroin, I guess what they call black tar heroin.		24 Q. Tattoos?	
25 Just maybe four or five times the size of a wooden		25 A. Yeah.	
	48		49
1 Q. Do you remember anything specific about		1 A. Maybe. I don't recall.	
2 tattoos?		2 Q. You mentioned earlier that there were	
3 A. No.		3 times when you were aware of inmates, maybe just	
4 Q. Did he have any nicknames or anything		4 because they've been there a lot.	
5 like that?		5 A. Uh-huh.	
6 A. Not that I was aware of.		6 Q. Were you aware of any medical conditions	
7 Q. How would you refer to him?		7 that Crowson had?	
8 A. By Crowson, last name.		8 A. No.	
9 Q. So last name?		9 Q. Are you aware whether he had diabetes?	
10 A. Yes.		10 A. I don't believe so. Not at the time I	
11 Q. So if we call him Crowson then you know		11 was there.	
12 who he is?		12 Q. Are you aware whether he had	
13 A. Yeah.		13 Hepatitis C?	
14 Q. Did he have a brother that had been		14 A. I was not aware.	
15 incarcerated as well? Did you know his brother?		15 Q. Is that something that correctional	
16 A. Jerry Crowson?		16 officers would be interested in knowing?	
17 Q. Is that his name?		17 A. Some probably, yeah.	
18 A. Yeah.		18 Q. Would it change anything with the way	
19 Q. Why did you know him?		19 you dealt with inmates in any type situations if	
20 A. I had a lot of experience with him, too.		20 they had Hepatitis C?	
21 Q. Okay. Had you ever initiated		21 A. It wouldn't change the way I dealt with	
22 disciplinary proceedings against Crowson?		22 inmates, no.	
23 A. No.		23 Q. How did you deal with inmates?	
24 Q. Has he ever filed grievances against		24 A. Fair, respectful, best I could. We used	
25 you?		25 a lot of humor, talked a lot. Inmates knew that so	

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1 long as they talked -- they could come to me with 2 anything that they wanted to say so long as they 3 talked and were respectful and did it in a proper 4 manner?		1 Q. Do you want to give me examples? 2 A. Yeah. 3 Q. What are those? 4 A. He was going to try to feed lunch -- he
5 Q. Okay. 6 A. Even if they wanted to call me a dirty 7 rotten SOB, so long as they did it the right way.		5 was in E block at the time and before lunch we do a 6 head count, which is a numbers count. At the time 7 the meals are served inmates come to the door to get 8 their tray with their ID card. We check their name 9 off the roster. We do a face count. So this one 10 particular day you kind of wait for the inmates to 11 line up at the door and Mr. Crowson was on the phone 12 so I stepped inside the section and kind of waiting 13 for him. I know that I said something, I don't 14 specifically recall, but he put his finger up -- he 15 was talking on the phone and he was like --
8 Q. Would it surprise you to learn that 9 Crowson didn't feel like you were respectful to him? 10 A. No, that would not be surprising to me.		16 Q. You were giving him the sign. I want to 17 get it described for the record. 18 A. Holding up his finger like wait a
11 Q. Why is that? 12 A. Because I didn't give him what he seemed 13 to expect from everybody.		19 minute. 20 Q. He was holding up his finger like wait a 21 minute?
14 Q. What's that? 15 A. He wanted everybody to respect him. 16 From my experience dealing with people in the jail, 17 when they talk respect they mean fear a lot of the 18 times. I had no reason to fear him. I wasn't going 19 to back down and whenever I was dealing with him he 20 always seemed to think that he was pretty important. 21 He was no more important than anybody else but at 22 times he thought he was.		22 A. He wants me and the other 40 something 23 inmates to wait for him to get done with his phone 24 call before we get to the meal, and in a 25 correctional setting you don't do that. You don't
23 Q. How did you deal with that when he felt 24 like he was more important? 25 A. Depending on the situation.		52 53
1 make other inmates wait for their food. 2 And in that particular instance I turned 3 the phone call off -- I had the phones turned off -- 4 they should have been turned off before. And he 5 started making loud complaints about cutting his 6 phone call off. And I said, "We're waiting for you 7 to get in line for meals." 8 And he went back to his bunk and 9 started, I don't remember -- doing nothing but 10 wasn't going to get in line. He was still making 11 everybody wait to get lunch served and he was making 12 a loud production of it. 13 And so I had him turn around and put 14 handcuffs on him and escorted him out of the section 15 because it was -- at least for me, inmates weren't 16 allowed to make a big production in front of 17 everybody and not have something happen. More times 18 than not I will cuff them up, take them out and talk 19 to them and try to make some sense of the situation 20 to them and give them the opportunity to kind of 21 step back and realize what they were doing didn't 22 coincide with the environment. 23 But Mr. Crowson, everything was about 24 him and so he was -- I don't know if I put him in 25 lockdown or if I put him in B block, in level 2	1 section. I know that he complained that I was 2 punishing him. I said, "I'm not punishing you. I'm 3 managing you because you can't manage yourself or 4 you don't manage yourself." 5 Q. As to this situation, how do you view 6 the difference between punishment and management? 7 A. Well, the management part was because he 8 actually put himself in harm's way by making the 9 other 40 some odd inmates wait on him. And in worst 10 places, correctional settings, you get seriously 11 hurt over that. And it's kind of an unwritten rule 12 in corrections that you don't come between an inmate 13 and his food. 14 Q. Are you aware in that particular 15 situation of any direct threat of harm to 16 Mr. Crowson? 17 A. No. If there was, he didn't act like 18 it. But at the same time, when an inmate does that 19 I'm not going to wait around to find out either. 20 That was a situation where I felt that he needed to 21 be removed from that environment. 22 Q. Do you remember the approximate dates 23 that occurred? 24 A. No. 25 Q. What are some other things you remember	

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	54		55
1	about Mr. Crowson?	1	foundation. Calls for speculation.
2	A. I remember when he was in B block he was	2	Q. Let me ask that question again and we
3	constantly complaining that I was after him, that I	3	can get the objection as well. Are you aware of
4	didn't like him, which was true, I didn't like him.	4	other correctional officers who handled Mr. Crowson
5	He just refused to do his own time, wanted to always	5	in any different manner?
6	make things a big production, especially what he	6	A. No.
7	thought was going on between he and I.	7	Q. You're not aware of any others?
8	Q. What do you mean by that?	8	A. No. I don't recall. I'm not there
9	A. Just that there was no love lost there	9	24/7.
10	which for me it was neither here nor there. It was	10	Q. Did you ever observe any other
11	my job. I wasn't there to be a miserable person.	11	correctional officers handcuff Mr. Crowson and take
12	It was a miserable environment to begin with. And	12	him to a different block?
13	my first priority every day was not to be a	13	A. No.
14	miserable person and not to make people's lives more	14	Q. Did you ever observe other correctional
15	miserable than they already are. The corrections	15	officers have interactions with Mr. Crowson?
16	staff is not part of the punishment equation. We're	16	A. I'm sure that I did but I specifically
17	there to make sure the inmates are healthy and are	17	don't recall.
18	cared for.	18	Q. Do you recall any other incidences of an
19	Q. Okay. The part about being cared for,	19	adverse interaction with Mr. Crowson between you and
20	is that part of a mission statement or policy that's	20	Mr. Crowson?
21	written down?	21	A. Not off the top of my head, no.
22	A. No. That's how I saw it.	22	Q. Do you remember an incident where there
23	Q. Were there other correctional officers	23	was an inmate who ejaculated into peanut butter and
24	who dealt with Mr. Crowson differently?	24	had another inmate eat it?
25	MR. MYLAR: Objection. Lack of	25	A. No, I do not recall that at all.
	56		57
1	Q. You don't recall that at all.	1	violate an attorney-client communication --
2	A. No.	2	A. Okay.
3	Q. Do you feel like you knew Mr. Crowson	3	Q. -- but if there were specific documents
4	well enough to tell if he was acting abnormally?	4	that you looked at, we can find out what you looked
5	A. Yeah.	5	at.
6	Q. Do you know how many times Mr. Crowson	6	A. I don't know specifically what I was
7	had been incarcerated in Purgatory?	7	looking at.
8	A. No.	8	Q. Okay. Do you know if it was a printout
9	Q. This particular incident happened in	9	of what was in Spillman?
10	June of 2014.	10	A. No.
11	A. Which one?	11	Q. Can you describe what the documents
12	Q. The one that this lawsuit is about.	12	looked like?
13	A. Oh, okay.	13	A. Like that right there.
14	Q. Just in general. I'm not talking about	14	Q. I was going to get to these.
15	any specific things that happened with you that day.	15	A. Okay.
16	A. Okay.	16	Q. So, for example, I'm just showing you
17	Q. In June 2014. The records indicate that	17	what's been marked as Washington Crowson 050.
18	Mr. Crowson came in on June 11, 2014. Do you know	18	A. No. That's a Spillman printout and I've
19	if that's accurate?	19	not reviewed any of those.
20	A. I have no idea.	20	Q. You haven't looked at that?
21	Q. What records did you review to prepare	21	A. No.
22	for your deposition?	22	Q. How about this?
23	A. Whatever came from his law firm.	23	A. That format looks familiar.
24	Q. Let me give you some instructions	24	Q. 0483, this format looks familiar to you?
25	because I don't want you to say anything that would	25	A. Yeah.

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1 Q. You did not look at any Spillman		1 employed with the county he was a nurse at the jail.
2 printouts then?		2 Q. Do you know who Alan Dressler is?
3 A. No.		3 A. Yes.
4 Q. What kind of information was in the		4 Q. Who is Alan Dressler?
5 records that you looked at?		5 A. He is or was a reserve officer with the
6 A. I believe it was a timeline, some kind		6 county.
7 of timeline for --		7 Q. Did he work in the jail?
8 MR. MYLAR: Just for the record, that		8 A. Not that I ever saw. I know I saw him
9 would have been attorney work product if he looked		9 as a reserve on the patrol side.
10 at a timeline.		10 Q. How about Paul Dolgnar?
11 A. Okay.		11 A. He was a corrections officer in the
12 Q. So a timeline. Anything else?		12 jail.
13 A. No. Just the legal filings.		13 Q. Do you know if Mr. Dolgnar worked in
14 Q. Okay. Are you aware of any document or		14 booking?
15 log that could be printed from the prison system		15 A. I don't know for sure.
16 other than in Spillman?		16 Q. How about Jason Wittwer?
17 A. I'm not aware, no.		17 A. I don't know who that is.
18 Q. Did the document that you looked at have		18 Q. How about Pete Merrill?
19 dates and times on it?		19 A. Pete Merrill is -- was, is a corrections
20 A. I believe it had dates. I don't believe		20 officer.
21 it had times on it.		21 Q. How about Brian Jensen?
22 Q. Do you know who Ryan Borrowman is?		22 A. Brian Jensen was a corrections officer
23 A. Yes.		23 when I was there.
24 Q. Who is Ryan?		24 Q. Clint Allred?
25 A. He is a nurse, or when I was still		25 A. He was a corrections officer while I was
	60	61
1 there.		1 logs tell me, okay?
2 Q. Robert Bates Brandt?		2 A. Uh-huh.
3 A. Robert Brandt was a corrections officer		3 Q. This is just for the record. Washington
4 and he I believe got his master's degree, some kind		4 Crowson 0510 indicates that there was an inmate
5 of social worker/therapist. I don't know exactly		5 disciplinary hearing on June 18, 2014. The officer
6 what. I just know he went back to college.		6 is listed as Robert Brandt.
7 Q. Okay. How about Bill Crocker?		7 A. Okay.
8 A. Bill was a corrections officer while I		8 Q. Do you know if that means that he was
9 was there.		9 the hearing officer?
10 Q. Jay Scouser?		10 MR. MYLAR: Objection. Lack of
11 A. He was a corrections officer at some		11 foundation.
12 point while I was there.		12 Q. I can show you what I'm looking at.
13 Q. Do you know who the hearing officer		13 A. To my understanding and what I remember,
14 would have been for disciplinary proceedings at that		14 that would have meant that he was the disciplinary
15 time?		15 hearing officer.
16 A. No.		16 Q. Okay. IDHO Brandt?
17 Q. That was somebody who was a corrections		17 A. Correct.
18 officer?		18 Q. Do you know what IDHO stands for?
19 A. Yes.		19 A. Inmate disciplinary hearing officer.
20 Q. Did it rotate through people or how was		20 Q. What was the hierarchy of the
21 it set up?		21 correctional officer structure -- sergeants,
22 A. I don't know. They received special		22 lieutenants?
23 training for it but I don't know who or what, when		23 A. Sergeants and lieutenants and jail
24 or why.		24 commander.
25 Q. Let me put this in context of what the		25 Q. What position did you hold?

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1	A. Line staff.	1	A. Correct.
2	Q. What's the difference between -- what's	2	Q. What would that mean?
3	the ranking, hierarchy?	3	A. Well, for whatever inmate that is on, if
4	A. What do you mean?	4	it's on Mr. Crowson, that would indicate that he
5	Q. Who's in charge of who?	5	received one hour out of his cell.
6	A. I'm not --	6	Q. Okay. And this was lockdown checked
7	Q. What's the highest rank, sergeant or	7	yes.
8	lieutenant?	8	A. Right.
9	A. The jail commander.	9	Q. He's in A block on lockdown.
10	Q. Jail commander? And then under jail	10	A. Correct.
11	commander, who?	11	MR. MYLAR: What year is this?
12	A. Lieutenant, sergeant, then all of the	12	MR. SCHRIEVER: June 20, 2014.
13	line staff.	13	MR. MYLAR: Okay.
14	Q. Okay. Were you ever considered or did	14	Q. At 6:57:33. The officer was Brian
15	you ever put in for promotion to sergeant or	15	Jensen. He was the correctional officer, correct?
16	lieutenant?	16	A. Yes.
17	A. No.	17	Q. And then Washington Crowson 0525, this
18	Q. I'm looking at, for the record,	18	is 6:18:14. Same thing but Officer Bill Crocker.
19	Washington Crowson 0524. This one says in that	19	Time out of cell. Would there be a record kept for
20	description, block A and then it has upper tier. It	20	every time he was let out of his cell?
21	has an X after the upper tier.	21	A. There should have been.
22	A. That means he was housed on the upper	22	Q. So he was out for one hour every other
23	tier, whoever that is about.	23	day?
24	Q. And the date on this is July 20, 2014	24	A. Correct.
25	and it says type of event, TOC, time out of cell.	25	Q. Is there enough information to know
	64	65	
1	whether he would have been let out, restrained in	1	main 12.
2	handcuffs and shackles? If he was on lockdown would	2	A. Right. So 27 would be an upper bunk.
3	that be the policy or not?	3	All the odd numbers are upper bunks and all the even
4	A. No, not necessarily, if he was a level	4	bunks are lower so he was given a lower bunk.
5	1A. If he was just on lockdown then he would not be	5	Q. Okay.
6	restrained when he came out of his cell.	6	A. So this right here is automatically
7	Q. Where would he be allowed to go?	7	generated from the computer when you enter the ICC.
8	A. To the day room. He would have access	8	So this is not entered by a staff. Does that make
9	to a phone to call an attorney, or the kiosk, the	9	sense?
10	shower and I believe that would be it.	10	Q. Yeah. Does staff select which bunk to
11	Q. Would there be anybody else in the day	11	put him in?
12	room at that time?	12	A. Yes.
13	A. No.	13	Q. But the wording here is automatically
14	Q. He would have been in there by himself?	14	generated by the computer?
15	A. Should have been, yes.	15	A. Correct.
16	Q. Okay. Just for the record, looking at	16	Q. Okay. And the timestamp here of
17	Washington Crowson 0539, on this one it says the	17	3:31:52, do you know if that would be a.m. or p.m.?
18	type of event is ICC, inmate cell change, the date	18	A. Is it zero 3?
19	6-25-14?	19	Q. Yes.
20	A. Uh-huh.	20	A. That would be a.m. I believe the time
21	Q. Do you know what that refers to?	21	in Spillman is 24-hour time.
22	A. That would refer to him being reassigned	22	Q. Okay. Does that mean that at 3:30 in
23	another location from where he was.	23	the morning somebody physically went to F block main
24	Q. Okay. And down here it says assigned	24	27 and transferred him to F block main 12?
25	from Purg max at block main 27 to Purg max at block	25	A. No, that's not what that means.

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1	Q. What does that mean?	1	A. Because it has one, two, three different
2	A. That means that they changed it in the	2	reassignments and I've never seen that before.
3	computer at that time. It doesn't mean that he was	3	Q. Okay. Let me ask you about each one of
4	physically moved at that time.	4	these separately.
5	Q. Okay. Flipping back one page to 0538	5	A. Okay. There is not a date associated
6	and this is one you're indicated on, Brett Lyman.	6	with each time.
7	A. Okay.	7	Q. Right. There's just the one date, June
8	Q. It's reassigned from -- a couple of	8	25, 2014.
9	reassignments. Is that a reference to court	9	A. Right.
10	appearance or anything like that or what would that	10	Q. And it's 16:10:25, so that would be 4:10
11	concern?	11	in the afternoon?
12	A. Yes, that would have been -- I've never	12	A. Correct.
13	seen one like this before where it has all the	13	Q. That's when this was entered, not
14	different ones.	14	necessarily when these events occurred.
15	Q. Let me ask you this. So you're listed	15	A. Correct.
16	here as the officer.	16	Q. All right. So let me ask you this. The
17	A. Uh-huh.	17	temporary location.
18	Q. Does that mean that you made these	18	A. From --
19	entries only or does it mean you actually moved him	19	Q. From the court.
20	from these places?	20	A. Right.
21	A. I don't know. Because, like I said,	21	Q. Is that referring to a holding cell at
22	I've never seen this part before.	22	the court?
23	MR. MYLAR: Just for the record, you're	23	A. All right. See, I never have been to
24	indicating the bottom of that wording there on page	24	the new courthouse where they actually have holding
25	538.	25	cells so I don't know what's there. We would always
	68		69
1	put inmates on a temporary out count when they went	1	respond verbally, wasn't giving coherent answers to
2	to court so that when we went through the sections	2	questions, things like that. Did you observe
3	to do our body count we would know where they were.	3	anything like that?
4	They would leave the ID cards with us. So if that's	4	A. Not that I recall.
5	referring to a cell number 16, then that's something	5	Q. And then the very last one is reassigned
6	that -- I don't know.	6	from the detox, was back to the court. Do you know
7	Q. Okay.	7	why that's in there?
8	A. The temporary court and he was	8	A. That would be that he was in the detox
9	reassigned back to 12 when he came back from court.	9	cell and went to court.
10	MR. MYLAR: For the record, a minute ago	10	Q. This record stops right here. It means
11	counsel said it was July 25th. It looks like the	11	he left court or is there another record that checks
12	record says June 25, 2014.	12	him back in?
13	Q. Yes. I misspoke on that. June is what	13	A. There should be another record that
14	I meant. Does that make any sense to you?	14	checks him back in.
15	A. Yeah, it makes a little bit of sense.	15	Q. Can anybody else go in and change this
16	But, like I said, I've never seen it have more than	16	report or does it have to be you once you're listed
17	one of the reassignments on there like that.	17	as the officer that's making that report?
18	Q. All right. And this reassignment from F	18	MR. MYLAR: Objection. Lack of
19	block 12 to detox, do you know what went behind that	19	foundation.
20	decision?	20	A. Don't recall.
21	A. No.	21	Q. Just so I'm clear, the fact that you
22	Q. Anything that you personally observed?	22	entered this into the computer doesn't mean that you
23	A. Not that I recall.	23	were the one that --
24	Q. Okay. And I'll just represent to you	24	A. That means that I did a move.
25	some of the records indicate that he was slow to	25	Q. Okay.

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<p>1 A. Because nobody else can log in under my 2 name.</p> <p>3 Q. Okay. So that means that you did put 4 him in detox?</p> <p>5 A. No. From what I understand that means 6 that I put him to court because that's the one on 7 top.</p> <p>8 Q. Okay.</p> <p>9 A. Because, like I said, I've never seen 10 where it has more than one reassignment on there.</p> <p>11 Q. Do you know if it was -- so you wouldn't 12 know the order then that these happened in.</p> <p>13 A. No. There's no date assigned to them 14 other than the date that I made the log entry which, 15 when I was there, would have been that top 16 reassignment.</p> <p>17 Q. Okay. But the fact that your name is on 18 this does mean that you were the one who did these 19 transfers.</p> <p>20 A. No.</p> <p>21 Q. No?</p> <p>22 A. Like I said, to my recollection, it 23 means that I did the top one.</p> <p>24 Q. Okay. Only the top one.</p> <p>25 A. Yes. Because I have not seen --</p>	70	<p>1 Spillman goes through updates and it changes from 2 time to time and I have never seen it like that 3 before.</p> <p>4 Q. Okay. Is it possible somebody went in 5 after the fact and changed your entry?</p> <p>6 A. I guess it could be.</p> <p>7 Q. As line staff did you have access to 8 change entries made by other officers?</p> <p>9 A. I don't really know. I know there was 10 some things that once they were done you couldn't go 11 back and change them. It would generate another 12 report because they would have a modify button or 13 something somewhere but I don't recall enough about 14 Spillman to remember what could or what couldn't.</p> <p>15 Q. Okay. Did you have any conversations 16 with any of the other corrections officers about 17 particular inmates?</p> <p>18 A. I don't recall specific conversations, 19 no.</p> <p>20 Q. For example, did you ever have any 21 conversations with other correctional officers about 22 Martin Crowson?</p> <p>23 A. I don't recall specifically.</p> <p>24 Q. Okay. Let me ask you about the 25 difference here between 0531 and 0538. 0531 is out</p>	71
<p>1 to court also entered by you on June 25, 2014 at 2 13:30. And then at 16:25 on June 25, 2014 that's 3 where we get the multiple entries on 0538.</p> <p>4 A. So that one is from court to F12. And 5 what's this one? This one is reassigned 12. So he 6 would have gone to court. This one is when he left 7 to court and that other one is when he was coming 8 back.</p> <p>9 Q. So 16:10, which is 4:10 p.m., he comes 10 back and then these entries get put in here?</p> <p>11 A. Like I said, I don't recognize that 12 format.</p> <p>13 Q. Okay.</p> <p>14 A. Usually they look like the other two 15 where it just has the single thing.</p> <p>16 Q. Okay. This wasn't you but it was Jason, 17 0540, again we're on June 25, 2004 at 2:32 which 18 is --</p> <p>19 A. A.m.</p> <p>20 Q. -- a.m. and this one is assigned from 21 Purg max A block mezz 205B to Purg max F block main 22 27.</p> <p>23 A. Right. So he would have been moved from 24 A block to F block.</p> <p>25 Q. Sometime before 2:32 a.m. on June 25th.</p>	72	<p>1 A. Yeah.</p> <p>2 Q. At or before.</p> <p>3 A. It could be after. They could have gone 4 in and moved him physically and then come back in 5 and then done the computer. But it would have been 6 close to that time that he physically moved, I 7 guess.</p> <p>8 Q. Okay. So based on these records and the 9 way you understand that it worked, would he have 10 been in A block on lockdown from at least June 18th 11 to June 25th?</p> <p>12 A. Sounds like it, yes.</p> <p>13 Q. Okay.</p> <p>14 A. How many days would that have been?</p> <p>15 Seven days?</p> <p>16 MR. MYLAR: Let me say that I object to 17 lack of foundation because he doesn't have personal 18 knowledge about what was happening on some of these.</p> <p>19 MR. SCHRIEVER: Okay.</p> <p>20 Q. Actually, let me go back here because on 21 05401 on 6-17-14 at 5:22 a.m. it's an ICC, inmate 22 cell change, Officer Glen Allred, F block, May 29 to 23 mezz 205B he got transferred to A block.</p> <p>24 A. Yes.</p> <p>25 Q. Okay. So 6:17, sometime on the 25th,</p>	73

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1 **seven to eight days?**

2 A. Right.

3 **Q. And then every one of these says Purg**
4 **max. Is that just referring to the jail in general?**

5 A. Yes. Max is the one end of the jail.

6 The other end of the jail would have been central or
7 listed like that would be CENT.

8 **Q. And which blocks were in Purg central?**

9 A. G, H, I, J, K.

10 **Q. And as you sit here today you have no**
11 **memory of putting Crowson into the detox cell; is**
12 **that right?**

13 A. No, I don't.

14 **Q. And looking at that document, does that**
15 **refresh your recollection as to whether or not you**
16 **did that?**

17 A. No.

18 MR. WIGHT: What was the date of your
19 last question?

20 MR. SCHRIEVER: June 17th was the last
21 one.

22 **Q. Do you have any memory of Mr. Crowson**
23 **being transported to Dixie Regional Hospital on or**
24 **about July 1, 2014?**

25 A. No.

1 **Q. If a decision was made to move an inmate**
2 **to detox, were there forms to be filled out?**

3 A. I don't believe so.

4 **Q. Other than Spillman, any log kept of**
5 **reasons for cell transfer other than that, anything**
6 **like that?**

7 A. If it was medical, then it would be a
8 medical thing. It seems like somebody should have
9 kept one about why.

10 **Q. Okay. I want to show you what is**
11 **Washington Crowson 0529. You're listed as the**
12 **officer.**

13 A. Okay.

14 **Q. Would you read the description.**

15 A. Sure.

16 **Q. Can you read it out loud or read it to**
17 **yourself, whatever you prefer.**

18 A. "Inmate Crowson did not show up to the
19 line for breakfast this morning. I stepped into the
20 section and called for him. When he did come out of
21 the lower tier he appeared to me to be lethargic and
22 slow. I asked him to get a food tray. He turned
23 around, went back to the lower tier. Deputy Dolgnar
24 came to F block and escorted him to booking.
25 Medical checked Crowson and found nothing wrong with

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1 his vitals. He was later moved to the detox cell
2 for observation."

3 **Q. Does that refresh your recollection as**
4 **to anything that happened that day?**

5 A. Not specifically, no. The whole
6 incident of him right here, I mean I kind of
7 remember in general but I don't remember the
8 specifics about it.

9 **Q. What do you generally remember about it?**

10 A. Just what happened, that something was
11 wrong with him and he went to medical and medical
12 saw him. That's about as specific as my memory is
13 about it.

14 **Q. And then you don't have any other -- do**
15 **you have any memories of him after that?**

16 A. No, I don't.

17 **Q. Any memory of him in Purgatory jail**
18 **after that?**

19 A. No.

20 **Q. Okay. Just so that we're clear, the**
21 **date on this one is also June 25, 2014; is that**
22 **correct?**

23 A. You're asking me?

24 **Q. Yeah. Well, I'm just asking to confirm**
25 **that's correct.**

1 MR. MYLAR: Are you asking if the
2 document says that?

3 MR. SCHRIEVER: Right.

4 **Q. And the timestamp is 17:48:10.**

5 A. Yes. That would have been 5:00 in the
6 afternoon so that probably would have had to do
7 with -- well, I entered that probably right before
8 shift change.

9 **Q. Okay. And the other timestamp that had**
10 **the multiple cell changes on it was roughly an hour**
11 **before that. Why is that? Why would that be?**

12 A. Depends on --

13 MR. MYLAR: I'm going to object. Lack
14 of personal knowledge. Lack of foundation. And
15 you're calling for speculation right now.

16 A. If things got really busy and hectic,
17 usually these things got left until the very end of
18 the shift because inmates are coming back from
19 court, if you had some kind of emergency, inmates
20 had to be moved, there could have been several
21 reasons why. Specifically, I couldn't tell you.

22 **Q. Did your shift end at 6:00?**

23 A. It did.

24 **Q. If Mr. Crowson were in the detox cell**
25 **would you have still been in a position where you**

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1	would have been observing him in any capacity?	1	A. Yes, absolutely.
2	A. Official capacity, no.	2	Q. How about when they came out of
3	Q. How about when he was in A block, would	3	lockdown?
4	you have had any official reason to observe him	4	A. Probably not so much.
5	while he was in A block?	5	Q. Are you aware of any correctional
6	A. Yeah. If I had been going through my	6	officers who were providing drinks or alcohol to
7	hourly cell check, if I happened to be by there	7	inmates?
8	while he was out of his cell, yeah, that would have	8	A. Nope.
9	been included in the work area.	9	MR. SCHRIEVER: All right. Mr. Lyman, I
10	Q. Do you have any memories of him being in	10	believe those are all the questions I have for you.
11	A block during that time period?	11	EXAMINATION
12	A. No.	12	BY MR. WIGHT:
13	Q. What is a visual body cavity search?	13	Q. I just have a couple of brief questions.
14	A. I believe it is where you make an	14	Are you familiar with Dr. Judd Larrowe?
15	observation of each -- well, I don't want to say	15	A. Yes.
16	each orifice but I know it includes them naked and	16	Q. Do you have any recollection of
17	spreading their checks apart and making sure there's	17	Dr. Larrowe treating Mr. Crowson?
18	nothing visible in their anal cavity.	18	A. Not specifically, no.
19	Q. Does that include mouth as well?	19	Q. Were you involved in any of that?
20	A. Yeah. Mouth, ears --	20	A. In treating him?
21	Q. Nose?	21	Q. No. Were you ever there to observe
22	A. -- nose, toes, in between their toes,	22	Dr. Larrowe treating Mr. Crowson that you can
23	bottoms of their feet, under their armpits.	23	recall?
24	Q. Is it typical to perform a visual body	24	A. It's commonplace for us to be around or
25	cavity search before an inmate went into lockdown?	25	for officers to be around when inmates are with the
	80		81
1	doctor. Specifically me and Crowson, I don't recall	1	population?
2	that.	2	A. Yes.
3	MR. WIGHT: All right. That's all the	3	Q. Was it secured as well?
4	questions I have. Thank you.	4	A. It could be, yes.
5	MR. MYLAR: I don't have any.	5	Q. Were there generally correctional
6	FURTHER EXAMINATION	6	officers in the exam room at any time the inmate was
7	BY MR. SCHRIEVER:	7	in there?
8	Q. Let me follow up real quickly. In	8	A. Not necessarily.
9	relation to Dr. Larrowe, do you know how often he	9	Q. What would the circumstances be under
10	came to prison or to the jail?	10	which a correctional officer would be in there with
11	A. It seemed like it was about once a week.	11	an inmate?
12	Q. Do you know how long he stayed there?	12	A. If the medical staff felt uneasy or if
13	A. I guess it depended on how many inmates	13	the inmate was agitated.
14	he was scheduled to see.	14	Q. And if it was necessary for a
15	Q. So you don't know if it was a set	15	correctional officer to be there, how would the
16	schedule or not?	16	correctional officers find out that that was
17	A. No, I don't.	17	requested?
18	Q. Did he have an office there?	18	A. From the staff, from the medical staff.
19	A. No.	19	They would just ask, "Can you come in here with us,
20	Q. Did the nurses have an office there?	20	please."
21	A. I believe so. Wait. No, they did not	21	Q. Radio communication?
22	have an office.	22	A. No.
23	Q. An exam room?	23	Q. What kind of communication would that
24	A. They had an exam room.	24	be?
25	Q. Was it separate, away from the general	25	A. Just face-to-face, right there.

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1 **Q. They would just come in and ask you.**
2 **Did you guys have radios that you communicated with?**
3 A. Yes.
4 **Q. Were medical staff on radios as well?**
5 A. They had access to the radios, yes.
6 **Q. What kind of weapon did you have in the**
7 **jail?**
8 A. We didn't have weapons in the jail.
9 **Q. Did you have an asp or anything?**
10 A. No, nothing. I had nothing but a
11 flashlight and handcuffs.
12 **Q. How tall are you?**
13 A. Six three.
14 MR. SCHRIEVER: All right. Thank you,
15 sir.
16 MR. WIGHT: Nothing further.
17 MR. MYLAR: Nothing further. Read and
18 sign.
19 (Whereupon the taking of this deposition was
20 concluded at 11:20 a.m.)
21 * * *
22 Reading copy submitted to Mr. Mylar.
23 Original transcript submitted to
24 Mr. Schriever.

BRETT LYMAN

Notary Public

My Commission Expires:

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Linda Van Sassel

Linda Van Tassell
RDR/RMR/CRR

April 16, 2018

<p>0</p> <p>0483 57:24 050 57:17 0510 61:4 0524 62:19 0525 63:17 0529 75:11 0531 71:25 0538 66:5 71:25 72:3 0539 64:17 0540 72:17 05401 73:21</p> <hr/> <p>1</p> <p>1 33:18 37:18 74:24 11 25:15 56:18 11:20 82:20 12 34:23 65:1,24 68:9,19 12-10-66 6:7 13 40:5 13:30 72:2 14 40:5 15 40:5,6 16 32:18 40:5 68:5 16:10 72:9 16:10:25 67:10 16:25 72:2 17 40:5 17:48:10 77:4 17th 74:20 18 61:5 18th 73:10 19 40:6 1998 7:9 8:25 1A 33:13 64:5 1s 33:19</p> <hr/> <p>2</p> <p>2 52:25 20 62:24 63:12 2004 72:17 2014 56:10,17,18 61:5 62:24 63:12 67:8 68:12 72:1,2 74:24 76:21 2015 6:21 7:5 11:24</p>	<p>2018 7:6 205B 72:21 73:23 24-hour 65:21 24/7 55:9 25 67:8 68:12 72:1,2,17 76:21 25th 68:11 72:25 73:11,25 26 8:4 27 64:25 65:2,24 72:22 29 73:22 2:32 72:17,25</p> <hr/> <p>3</p> <p>3 65:18 30 25:23 26:20 27:16,19 3:30 65:22 3:31:52 65:17</p> <hr/> <p>4</p> <p>4 34:23 40 9:12 51:22 53:9 435 632-8622 3:18 48 25:21 4:10 67:10 72:9</p> <hr/> <p>5</p> <p>5 32:18 50 25:22 538 66:25 5:00 77:5 5:22 73:21</p> <hr/> <p>6</p> <p>6-17-14 73:21 6-25-14 64:19 60 25:22 6:00 77:22 6:17 73:25 6:18:14 63:18 6:57:33 63:14</p> <hr/> <p>9</p> <p>98 6:21</p>	<p>A</p> <p>A-R-M-A-N-D 3:14 a.m. 65:17,20 72:19,20,25 73:21 82:20 ABC 16:3 ability 5:10 44:4 abnormally 56:4 abomination 44:15 absolutely 79:1 academy 8:14 accept 20:5 accepted 20:5,13 access 22:4 23:18 26:23 36:17,19 40:11 44:1,9 64:8 71:7 82:5 accurate 56:19 accused 16:15 act 53:17 acting 56:4 administered 36:9 administrative 13:16,18 14:1 adverse 55:19 AED 9:14 affected 11:19 African 13:5 afternoon 67:11 77:6 agency 23:5 agitated 81:13 ahead 13:2 29:21 31:10 41:7 Alan 59:2,4 Alcatraz 31:21 alcohol 40:20 41:2,4 44:9, 11,13 79:6 alert 44:4 allegations 4:1 allergies 22:13 allowed 33:7 37:14,19,23 52:16 64:7 Allred 59:24 73:22 alongside 9:22 10:4 American 13:5 anal 78:18 annual 9:11 answers 4:13 69:1 appearance 66:10 appeared 44:17 75:21</p> <hr/> <p>B</p> <p>back 21:4 23:11 27:1 35:1 37:25 43:7,11 50:19 52:8, 21 60:6 66:5 68:9 69:6,12, 14 71:11 72:8,10 73:4,20 75:23 77:18 backed 13:12 background 5:17 7:18 8:23 12:4 bag 35:8 45:7 bags 45:17 bars 32:10,12 base 45:2,7 based 73:8 basic 9:10 10:12 basically 17:20 basis 25:2 Bates 60:2 bed 26:14 beds 27:18 began 16:18 begin 54:12 behalf 3:3 behavior 33:15 belief 24:21 25:2</p>
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